



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 Broadway

New York, NY 10007-1866

June 8, 2022

Via Electronic Mail

Robert Spiegel
Executive Director
Edison Wetlands Association
206 Tyler Road
Edison, NJ 08820

Dear Mr. Spiegel:

Thank you for your May 25, 2022, letter to Walter Mugdan, Deputy Regional Administrator for U.S. Environmental Protection Agency (EPA) Region 2, concerning the EPA's reevaluation of the remedy selected in EPA's 2013 Record of Decision (ROD) for the Woodbrook Road Dump Superfund Site (Site), as modified by the 2018 Explanation of Significant Differences (ESD). Your letter regarding EPA's decision to reevaluate the remedy, which also forwarded technical comments from your consultant Excel Environmental Resources, Inc., notes concern about the current remedy reevaluation and urges EPA to implement the remedy selected in the 2013 ROD. Mr. Mugdan has asked me to respond to your correspondence.

As stated in your letter, in December 2020, EPA Region 2 publicly announced that it would conduct a technical and scientific review of the remedy selected in the 2013 ROD, as modified by the ESD. The decision to review the remedy was made by the former EPA Administrator based on a recommendation from the then-Assistant Administrator for EPA's Office of Land and Emergency Management (OLEM). EPA Region 2 is currently conducting this review via a Focused Feasibility Study (FFS) in accordance with the National Contingency Plan (NCP) and in coordination with both the New Jersey Department of Environmental Protection and OLEM's Office of Superfund Remediation and Technology Innovation. Should this review result in any proposed changes to the remedy, such changes would be presented to the public in accordance with NCP procedures. For instance, if, after our review, we come to the conclusion that an ESD or ROD amendment is appropriate, EPA Region 2 will follow the statutory, regulatory and procedural requirements for any such revision of the ROD remedy, including an opportunity for public comment pursuant to the procedures set forth in the NCP.

EPA is making progress on the FFS, although the work is taking longer than the originally anticipated six to eight months projected in EPA's December 2020 Community Update. EPA currently anticipates completing an FFS by the end of 2022.

In the transmittal email to your letter, you request that EPA immediately schedule a public hearing to discuss implementation of the remedy selected in the ROD so that the Site cleanup is not "further delayed." We appreciate your concern about the cleanup schedule; however, the Region does not expect to conduct a public hearing, or otherwise meet with any parties outside of the federal and state governments to discuss the remedy or its reevaluation while the reevaluation process is ongoing. As

noted above, the reevaluation process may lead to a public comment period. In that case, EPA would then consider any comments provided at that time.

We recognize the importance of this matter to Edison Wetlands Association and thank you again for your letter.

Sincerely,

Evangelista, Pat

Digitally signed by Evangelista,
Pat
Date: 2022.06.08 08:55:47 -04'00'

Pat Evangelista, Director
Superfund and Emergency Management Division